UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 2 4 2014

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
Article Number: 7005 3110 0000 5967 7643

Mr. David Griswold
Preble Hill Farm, LLC
Box 15
Preble, NY 13141

RE: Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act
Preble Hill Farms Concentrated Animal Feeding Operation (NYA000168)
Docket No. CWA-IR-14-025

Dear Mr. Griswold:

The United States Environmental Protection Agency ("EPA") is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 et seq. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, the EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Preble Hill Farms is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to the EPA documentation with accompanying photographs of the following no later than deadlines specified:

1. **No later than thirty (30) calendar days of receipt of this RFI**, submit documentation with accompanying photographs of the measures taken to address each of the Potential Violations and Areas of Concern specified in the enclosed Inspection Report.
2. **No later than thirty (30) calendar days of receipt of this RFI**, submit copies of daily water line inspections maintained by the Facility from June 2014 to the present day.

All information required to be submitted by this Request for Information shall be sent by certified mail or its equivalent to the following address:

Doughlas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
290 Broadway, 20th Floor
New York, NY 10007-1866

Any documents to be submitted by Preble Hill Farms must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the inspection report detailing the EPA's findings from its June 19, 2014 inspection at Preble Hill Farms.

If you have any questions regarding this Request for Information or the enclosed Inspection Report, please feel free to contact Christy Arvizu of my staff via phone at (212) 637-3961 or via email at arvizu.christy@epa.gov.

Sincerely,

Doughlas McKenna, Chief
Water Compliance Branch

Enclosures

cc: Joseph DiMura, P.E, Director, Bureau of Water Compliance Programs, NYSDEC
Joseph Zalewski, Regional Water Engineer, NYSDEC Region 7
Julie Melancon, NYSDEC Region 7

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [NYA0001681] 11	12 [140619] 17	18 [=]	19 [R]	20 [3]

Remarks

21 [ ] 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 [ ] 69	70 [ ]	71 [ ]	72 [ ]	73 [ ] 74 75 [ ] 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Preble Hill Farms
W Bennett Hollow Road
Preble, NY 13141

Entry Time/Date	Permit Effective Date
0805 06/19/2014	07/01/2004
Exit Time/Date	**Permit Expiration Date**
1400 06/19/2014	06/30/2009

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

David Griswold, Owner, (607) 423-8251
Charles Vogel, employee, (607) 423-5182
Ryan Travers, AEM planner, ACS, (585) 943-8556
Jeremy Langner, Service Mgr/Agronomist, ACS, (585) 314-8153

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

Name, Address of Responsible Official/Title/Phone and Fax Number

David Griswold, Owner, (607) 423-8251

Contacted: [✓] Yes [ ] No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

[✓] Permit	[ ] Self-Monitoring Program	[ ] Pretreatment	[ ] MS4
[✓] **Records/Reports**	[ ] Compliance Schedules	[ ] Pollution Prevention	
[✓] Facility Site Review	[ ] Laboratory	[ ] Storm Water	
[ ] Effluent/Receiving Waters	[✓] Operations & Maintenance	[ ] Combined Sewer Overflow	
[ ] Flow Measurement	[ ] Sludge Handling/Disposal	[ ] Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
[ ][ ][ ][ ][ ]	See inspection report
[ ][ ][ ][ ][ ]	
[ ][ ][ ][ ][ ]	
[ ][ ][ ][ ][ ]	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Christy Arvizu	DECA WCB 212-637-3161	9/4/2014

Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	DECA WCB 2126374268	9/23/14

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B ---- EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L ---- Local Health Department (State)
N — NEIC Inspectors
O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
P— Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

CAFO COMPLIANCE INSPECTION REPORT

Inspection Date: June 19, 2014 **Inspection Time:** 0805 - 1400	**Inspector:** Christy Arvizu, Environmental Scientist USEPA Region 2, (212) 637-3961
Weather Conditions: Partly sunny, low 60's to mid 70's	
Inspection Type: Compliance Evaluation Inspection	
On-Site Representatives: David Griswold, Owner, Preble Hill Farms, (607) 423 – 8251; Charles Vogel, employee, Preble Hill Farms, (607) 423 – 5182	
Other Attendees: Ryan Travers, AEM Planner, Agricultural Consulting Services, Inc., (585) 943 - 8556; Jeremy Langner, Service Manager/Agronomist, Agricultural Consulting Services, Inc., (585) 314-8153; Julie Melancon, Environmental Protection Specialist I, NYSDEC Region 7, (315) 426 – 7418	
Preble Hill Farms Site Information:	
Main Farm W Bennett Hollow Road, north of Preble Road Preble, NY 13141	Jack's Farm Intersection of W Bennett Hollow Road and Preble Road Preble, NY 13141
Blooms' Farm 2301 State Route 80 LaFayette, NY 13084	Kuss' Farm Tully Farms Road, south of Otisco Road LaFayette, NY 13084
NPDES/ICIS No.: NYA000168 SPDES General Permit No. GP-04-02	
SIC/NAICS Code: 0241/112120 (Dairy Farms)	
Attachments: *EPA Form 3560-3* *New York State Department of Environmental Conservation, Division of Water, CAFO Facility Inspection Report, Version 1.0 – 3/15/06*	

INTRODUCTION:

On June 19, 2014, the U.S. Environmental Protection Agency (EPA) conducted a Federal lead CAFO compliance inspection at Preble Hill Farms ("Preble Hill" or "Facility") located in Preble, New York. The Facility also has an additional satellite farmstead located down the road and two additional satellite farms located in LaFayette, New York. The EPA inspection team consisted of Christy Arvizu with EPA Region 2's Division of Enforcement and Compliance Assistance, Water Compliance Branch (DECA-WCB). Julie Melancon of New York State Department of Environmental Conservation (NYSDEC) Region 7 also accompanied EPA on the inspection. David Griswold and Charles Vogel represented Preble Hill. Also present were Ryan Travers and Jeremy Langner of Agricultural Consulting Services, Inc. (ACS). ACS has been retained as the Facility's farmstead and nutrient management planner. Weather conditions at the time of the inspection were in the mid 60's to low 70's and sunny. During the twenty-four hours prior to the inspection, Mr. Griswold stated that there was some rainfall.

The inspection was performed to determine the Facility's compliance with the requirements and limitations of 40 C.F.R. 122.42(e) as well as NYSDEC's State Pollutant Discharge Elimination System (SPDES) General Permit for Concentrated Animal Feeding Operations (CAFOs) General Permit No. GP-04-02.

INSPECTION PROCEDURE:

EPA Inspector Arvizu arrived at the Home Farm at 0805 hours on June 19, 2014. After arrival, EPA Inspector Arvizu presented credentials to Mr. David Griswold. While on-site, EPA Inspector Arvizu conducted an opening conference with Mr. David Griswold, Mr. Charles Vogel, Mr. Ryan Travers, and Mr. Jeremy Langner and completed the NYSDEC CAFO Inspection Report checklist. The EPA inspection team reviewed the Facility's rainfall, manure application, soil and manure analysis records and the Comprehensive Nutrient Management Plan (CNMP). The EPA inspection team conducted the field portion of the inspection and took photographs of potential noncompliance items at the Facility. At the conclusion of the field site visit, a closing conference was held at the Main Farm with Mr. David Griswold, Mr. Charles Vogel, Mr. Ryan Travers, and Mr. Jeremy Langner to discuss the preliminary findings and observations of the inspection. NYSDEC inspector Melancon was present for the closing conference as well. EPA Inspector Arvizu concluded the inspection at 1400 hours.

The EPA inspection team conducted the inspection in accordance with the procedures described in the "Routine Bio-Security Procedures for EPA Personnel Visiting Farms."

FINDINGS & OBSERVATIONS:

Facility Description:

Preble Hill Farms has four facilities (Main Farm, Jack's Farm, Bloom's Farm, and Kuss Farm) which are all located in Cortland County and Onondaga County. Mr. Griswold stated that Blooms Farm was acquired by the Facility in 2011 and Kuss Farm was rented from 2011 to 2013 when it was purchased by the Facility. On December 31, 1999, Preble Hill applied for coverage under the CAFO General Permit as a medium CAFO under GP-99-01. NYSDEC granted permit coverage on January 15, 2000 (NYA000168). When the CAFO General Permit was re-issued (GP-04-02) on June 24, 2004 with an effective date of July 1, 2004, permit coverage for Preble Hill was automatically renewed. On February 17, 2011, Preble Hill submitted a Notice of Intent or Transfer to NYSDEC as it was expanding from a medium CAFO to a large CAFO. On April 20, 2011, NYSDEC acknowledged receipt of Preble Hill Farms NOI and the date of coverage as a large facility was April 20, 2011.

In the event of a discharge, Mr. Griswold stated that there are no nearby streams at the Main Farm or at Jack's Farm. However, both farmsteads are within the Chesapeake Bay watershed. At the time of the inspection, Facility staff could not provide the names of nearby creeks at Blooms' or Kuss' Farms. Based on USGS maps and other topographical maps, EPA was able to determine that minor tributaries to the Upper Onondaga Creek flow to the west of Blooms' Farm and to the south and southeast of Kuss' Farm. The Upper Onondaga Creek is part of the Onondaga Lake – Onondaga Creek watershed.

According to Mr. Griswold, there were approximately 900 mature cows on-site at the time of the inspection. The Facility is considered to be a large CAFO as it meets or exceeds the large dairy CAFO threshold of 700 mature dairy cows, whether milked or dry.

The Main Farm consists of seven barns/structures:

1. Calf Barn
2. Heifer Barn
3. Freestall Barn
4. Dry Cow Barn
5. Sand Freestall Barn
6. Parlor & Holding Area
7. Bunk Silo

Jack's Farm consists of three barns/structures:

1. Tie-stall Barn
2. Heifer Freestall Barn
3. Chicken House

Blooms Farm consists of two barns/structures:

1. Heifer/Dry Cow Freestall
2. Bunk Silo

Kuss' Farm consists of one barn/structure:

1. Coverall Barn

There are two manure storage facilities in use at the Facility.

1. Main Farm Concrete Manure Storage Facility adjacent to the Freestall Barn with two associated reception pits
2. Main Farm Concrete Manure Storage Facility adjacent to the Sand Freestall Barn with associated reception pit

All waste from the milking parlor and holding area at the Main Farm is directed to the concrete manure storage facility adjacent to the Freestall Barn.

Comprehensive Nutrient Management Plan (CNMP):
Section VII.A of the NYSDEC CAFO General Permit requires each CAFO to develop and implement a CNMP. CNMPs are required to be prepared in accordance with Natural Resources Conservation Service (NRCS) Conservation Practice Standard NY312, good agricultural practices, and should include measures necessary to prevent pollutants in runoff. The CNMP for Preble Hill was prepared by Agricultural Consulting Services, Inc. and was reviewed on-site.

At the time of the inspection, based on discussion with Mr. Griswold and Mr. Travers and review of the 2013 Annual Compliance Report (Appendix D), the CNMP had been fully implemented.

The Facility's CNMP also listed the Phosphorus (P) Index and Nitrogen Leaching Index (NLI) scores for each field. According to the CNMP, there are no fields with very high P scores. Fields with very high NLI scores have adjusted practice recommendations such as cover cropping.

Recordkeeping:
As a large CAFO, the Facility is required to maintain and retain copies of the following records for a period of least five years from the date reported in accordance with Section IX.F of the Permit:

Facility became a large CAFO on April 20, 2011; therefore, recordkeeping requirements as a large CAFO go back to the date of permit coverage (e.g. 4/20/2011).

Record	**Permit Requirement**	**Observation**
Procedures for cleaning up spills shall be identified and the necessary equipment to implement a clean-up shall be available to personnel	Section VIII.C.xii	Documented in the Facility's Emergency Action Plan which is maintained in office and with NMP
Date, amount of manure, litter, and/or process wastewater exported, name and address of recipient, and provision of representative information on the nutrient content of manure, litter, and/or process wastewater to recipient, if greater than 50 tons are exported annually	Section VIII.C.xiii	Yes, and also maintained in computer
All precipitation events in excess of 0.3 inches	Section IX.K	April 2011 – December 2011 April 2012 – December 2012 April 2013 – December 2013 May 2014 – present day

		Rain gage maintained at back of Main Farm; no rain gage maintained at Blooms' or Kuss' which are located approximately 10-12 miles to the north of the Main Farm
Annual Compliance Reports	Section IX.L	2009 – 2011, 2013 maintained on-site 2012 forwarded to EPA after inspection on 7/2/2014
Manure analysis for nitrogen and phosphorus	Section IX.M	12/14/2009 – Main Pit, Sand Pit 10/26/2010 – Sand Pit, Jack's Farm 2/22/2011 – Main Pit 12/21/2011 – Main Pit, Sand Pit, Dry Cow Barn, Jack's Farm, Blooms Farm, Kuss' Farm 12/19/2012 – Sand Pit, Jack's Farm, Kuss' Farm 12/20/2012 – Main Pit, Dry Cow Barn, Blooms Farm 12/30/2013 – Main Pit, Main Pack (Solid), Sand Pit, Dry Cow Barn, Jack's Farm, Blooms Farm, Kuss' Farm
Weekly stormwater inspections of all stormwater diversion structures, animal waste storage structures, and devices channeling contaminated stormwater to the wastewater and manure storage and containment structure	Section IX.N.i	10/31/2011 – 11/14/2012; 1/7/2013 – present day *records were missing for an approximately 1.5 month period from mid November 2012 to January 2013.
Daily water line inspections (including drinking water or cooling water lines)	Section IX.O.i (Production Areas)	November 2011 – April 2012 January 2013 – August 2013 *Facility representatives stated that they were told that inspections no longer needed to be done or records maintained in August 2013.*
Weekly depth marker readings for manure and process wastewater in any open liquid storage structures	Section IX.O.ii (Production Areas)	Weekly depth marker readings available for the original concrete storage and the newer storage adjacent to the sand freestall barn for: October 31, 2011 – September 23, 2012 January 2013 – December 2013 January 2014 to present day
Any actions taken to correct deficiencies; deficiencies not corrected within 30 days must be accompanied	Section IX.O.iii (Production Areas)	When deficiencies are identified, the Facility notates the date they are identified and the corrective action taken and when (e.g. issues

by an explanation of the factors preventing immediate correction		with the depth marker in the manure storage, leaks, etc.).
Handling and disposing of dead animals	Section IX.O.iv (Production Areas)	Bills from American Rendering are available for 2010 -2014. In addition, mortality records are available electronically via Dairy Comp 305. *Records were maintained prior to Facility becoming a large CAFO*
Design of the manure and litter storage structures, including: - Volume of solids accumulation - Approximate number of days' worth of storage capacity - Design treatment volume - Calculations used to determine total design volume for storage structures	Section IX.O.v (Production Areas)	Reviewed the Facility's as-builts and documentation for the two manure storages and related pits. - Main Farm Freestall Barn & Parlor/Holding Area Concrete Storage (3/21/2008 certification by Dana Chapman, P.E.) - Main Farm Sand Freestall Barn Concrete Storage (1/25/2010 As-Builts by Dana Chapman, P.E.) - Main Farm Reception Pit #1 (3/21/2008 certification by Dana Chapman, P.E.) - Main Farm Reception Pit #2 (3/21/2008 certification by Dana Chapman, P.E.)
Overflows from the production area, including date and time and an estimate of the volume	Section IX.O.vi (Production Areas)	Mr. Griswold and Mr. Vogel stated that no overflows have occurred.
Weather conditions at time of manure application and for 24 hours prior to and following application	Section IX.O.i (Land Application Areas)	Weather conditions at time of land application and for 24 hours prior to or after application have been recorded since 2010 since before the Facility became a large CAFO.
Date(s) of manure application equipment inspection	Section IX.O.ii (Land Application Areas)	Mr. Griswold stated that the Facility calibrates its manure application equipment, but does not document when it does so.
Soil analysis results – "Nutrient planning shall be based on current soil test results developed in accordance with Land Grant University guidance or industry practice if recognized by the Land Grant University. Current soil tests are those that are no older than three years."	NRCS Conservation Practice Standard NY590 & Section IX.F	Soil test results indicate fields were tested between 2011 and 2014. Fields are tested on a rotational basis with fields sampled every year. Fields that were last sampled in 2011 are scheduled to be sampled this year.
Manure application records – "[d]ocumentation of the actual rate at which nutrients were applied. When the actual rates used differ from or exceed the recommended and planned rates, records will indicate the reasons for the differences."	NRCS Conservation Practice Standard NY590 & Section IX.F	Crop year 2009/2010 to present day

During the inspection, EPA Inspector Arvizu reviewed the following fields and associated manure application recommendation/records for crop year 2013:

Field	Recommendation (Source)	Application (Source)
M-3	9.5 ton/acre (Dry/Jack's)	32.7 ton/acre (Dry/Jack's) It was noted during the inspection that there appeared to be a discrepancy in the crop rotation between the 2013/2014 books and the recommendation for 2014. The 2013 recommendation was generated using first year corn when the field had been corn for a few years already. Subsequent to the inspection, Mr. Travers of ACS forwarded updated manure recommendations and manure logs for Crop Year 2013 utilizing the new data. Based on the new information, the Facility did not over-apply manure to Field M-3 as the total target was 113 lbs of N/acre and 88.4 lbs of N/acre were applied.
P-4	15,500 gallons/acre (Main Pit) 58.5 ton/acre (Jack's/Main)	10,900 gallons/acre (Main Pit) 3.2 ton/acre (Jacks/Main)
G-1	8,500 gallons/acre (Main Pit) 31.5 ton/acre (Dry/Jack's)	7,300 gallons/acre (Main Pit) 31.6 ton/acre (Dry/Jack's)

Clean Water:
Section VI.A of the CAFO General Permit generally prohibits the discharge of process wastewater from CAFOs to waters of the State. Section VII.B of the NYSDEC CAFO General Permit states that CNMPs are required to be prepared in accordance with "NRCS Conservation Practice Standard No. NY312" which requires that clean water be excluded from concentrated waste areas to the fullest extent practical.

Main Farm
The Facility stated that there are drip trenches on both sides of the Dry Cow Barn. In addition, there are tile lines in use at the facility.

All animals at the Main Farm are housed within the barns and there is no exposure to precipitation. Animals are either fed in the barns or feed alley ways are covered with no exposure to precipitation.

During the inspection, EPA Inspector Arvizu observed dirty pooling water adjacent to (and south of) the Heifer Barn. Mr. Vogel stated that stormwater in this area flows to a tile line to the north of the bunk silo which then outlets to a Vegetated Treatment Area on the south side of the bunk silo. The pooling water was black and contaminated with runoff from the bunk silo, Heifer Barn and Calf Barn. In addition to the pooling water adjacent to the Heifer Barn, EPA Inspector Arvizu observed semi-solid manure stored outside adjacent to the Calf Barn. Mr. Vogel stated that the manure was cleaned up on a daily basis. Mr. Vogel stated that the Facility planned to move calves to a new freestall barn that was to be constructed later in the summer.

Photo #1 – Ponded runoff adjacent to (and south of) the Heifer Barn, also note manure on concrete pad adjacent to Calf Barn in right of frame; view looking west

Photo #2 – Manure to the south of the Calf Barn; view looking north

Photo #3 – Flow path from ponded runoff noted in Photo #1 to tile line behind bunk silo; view looking northwest

Photo #4 – Inlet pipe to tile line on north side of bunk silo that receives overland flow and contaminated stormwater flow noted in Photos #1 and 3

EPA Inspector Arvizu also noted ponding of stormwater and contaminated runoff adjacent to the Facility's silage leachate collection system to the south of the bunk silo. Specifically, ponding was occurring south of the concrete pad near the Facility's settling basin and high flow distribution system. Mr. Travers and Mr. Vogel both stated that Mr. Griswold planned to install concrete in the driveway area to cut down on runoff and allow for easier clean-up. Mr. Vogel stated that the Facility tries to get into the area to clean out solids that collect, but has not been able to do so because it has been too wet.

Photo #5 – Ponding of bunk silo runoff adjacent to leachate collection system; view looking southeast

EPA Inspector Arvizu observed a stormwater catch basin at the south end of the Dry Cow Barn that was not identified on the Facility maps. Mr. Vogel stated that the catch basin discharged to a ditch. In the proximity of the general area of the catch basin, EPA Inspector Arvizu observed contaminated runoff from the Dry Cow Barn and loading and unloading operations. However, at the time of the inspection, runoff was not observed to be flowing into the catch basin.

Photo #6 – Catch basin at south end of Dry Cow Barn that outlets to ditch; note ponding of contaminated runoff and manure spreader and skid steer located to the right of the catch basin.

Jack's Farm
The Facility stated that there are no stormwater diversion systems in use at the facility as stormwater runs off to nearby fields.

All animals at Jack's Farm are housed in with barns with access to barnyards and pasture. Mr. Vogel stated that cows have access to the pasture from mid-May to October.

During the inspection, EPA Inspector Arvizu observed ponding water in the southeast corner of the Tiestall barnyard. Runoff from the barnyard could flow down the driveway toward a depressed area that leads to a field.

Photo #7 – ponded water at southeast corner of barnyard at Tiestall Barn

Blooms Farm
The Facility stated that there are no stormwater diversion systems in use at the facility as stormwater runs off to nearby fields.

All animals at Blooms Farm are housed in the Heifer/Dry Cow Freestall Barn and there is no exposure to precipitation.

EPA Inspector Arvizu observed a small drain/inlet adjacent to the high moisture corn silo. Feed residue was observed in the area in and around the drain. Mr. Vogel stated that he did not know where the inlet discharged, but believed that it may discharge to the Vegetated Treatment Area to the west of the freestall barn.

Photo #8 – Drain/inlet adjacent to high moisture corn silo, note residue on concrete pad immediately surrounding the drain; view looking west

Kuss' Farm
The Facility stated that there are no stormwater diversion systems in use at the facility as stormwater runs off to nearby fields.

All animals at Kuss' Farm are housed in a Coverall Barn. There is a barnyard on-site and cattle walkways with access to a pasture. However, Mr. Vogel stated that cows only have access to the pasture at Jack's Farm so no animals are pastured at Kuss' Farm.

Silage/Feed/Commodities Storage:
Section VIII.C.xi of the NYSDEC CAFO General Permit states that "[c]ollection, storage, and disposal of liquid and solid waste should be managed in accordance with NRCS standards." NRCS Conservation Practice Standard No. 312 "Waste Management System" states that "waste" includes polluted runoff such as that from a barnyard or silo, and that all farms with silage will address silage leachate control." In addition, NRCS Conservation Practice Standard No. 635 "Vegetated Treatment Area" (VTA) specifies general criteria applicable to all vegetative treatment areas as well as additional criteria for treatment of bunk silo leachate. Section X.G of the CAFO General Permit requires the permittee to, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with this permit.

Main Farm
Corn silage and haylage are stored in a 302' x 130' bunk silo. Leachate flows toward a high flow/low flow collection system and VTA located to the south of the bunk silo. Low flow leachate is collected in a 1,000 gallon storage tank before it is pumped to the manure storage and high flow leachate is directed to the VTA. At the time of the inspection, the silage was contained within the bunk and was covered with plastic and secured with tires.

The facility stated that the VTA was constructed in 2008 and was designed by a Professional Engineer (Dana Chapman, P.E. on 5/9/2011). Copies of the 5/9/2011 inspection and 4/13/2007 site plan were available for review. The VTA was designed to be 180 feet long and 120 feet wide according to the site plan. According to the 5/9/2011

professional engineer inspection, it was determined that the VTA did not substantially meet the requirements of Natural Resource Conservation Standards (NRCS) 635 as the following factors were present:

- Kill zone present.
- The length was not 300 feet which is required for bunk silo VTAs.
- The splitter box needed to be maintained in order to distribute flow evenly.
- Leachate that exited the bunk to the north, flowed overland and into a pipe is released into a grassed area.
- The P.E. stated that a level lip spreader or other device to create sheet flow and vegetated area that it flows to needs to be outlined and preserved as a VTA. A low flow collection device also needed to be utilized.

A very detailed operation and maintenance plan for the VTA was provided as it included procedures for collection areas, low flow separation, high flow collection and the VTA itself.

At the time of the inspection, EPA Inspector Arvizu observed the following:

- Excess solids in the collection system (an issue that was noted in the Facility's previous inspection conducted by NYSDEC on 8/27/2013).
- Overgrown vegetation in the VTA. Mr. Vogel stated that the VTA was last mowed during the fall of 2013.
- Significant kill zone observed in the VTA.
- Significant ponding and kill zone observed in VTA south of underbunk drainage which flows to on-site farm pond. Mr. Griswold stated that the farm pond was created as a result of a diversion that was constructed years prior.

Photo #9 – excessive solids build-up & kill zone at High Flow VTA at Main Farm; view looking south

Photo #10 – Overgrown vegetation at VTA at Main Farm; view looking west

Photo #11 – Excessive ponding south of underbunk drainage at Main Farm; note – this is where contaminated stormwater noted in photos #1, 3 & 4 discharges into

Photo #12 – Channelized flow from underbunk drainage collection system toward the on-site farm pond; view looking north

Photo #13 – Flow from underbunk drainage collection system (photos 11 & 12) toward on-site farm pond; view looking south

Jack's Farm

Mr. Griswold stated that high moisture corn is stored in a Harvestore silo at the site and there is no bunk silo.

EPA Inspector Arvizu did not observe any storage concerns at the site as the Harvestore was empty at the time of the inspection.

Blooms' Farm
Haylage is stored in a 100' x 60' bunk silo located at the facility. Mr. Griswold stated that some years he stores corn silage on-site, but it is mostly haylage that is stored at Blooms' Farm. Leachate flows toward a high flow/low flow collection system and VTA located to the west of the bunk silo. A minor tributary to the Upper Onondaga Creek is approximately 650 feet downslope from (and to the west of) the farmstead. Low flow leachate is collected in a 1,000 gallon storage tank and pumped into a manure spreader as needed and high flow leachate is directed to a VTA. At the time of the inspection, the silage was contained within the bunk and was covered with plastic and secured with tires.

The facility stated that the VTA was constructed in 2011 and was designed by the local Soil and Water Conservation District. In addition, it had been inspected by a professional engineer on 5/9/2011 (Dana Chapman, P.E.). Copies of the 5/9/2011 inspection and 2000 site design were available for review. The VTA is divided into three cells and Mr. Griswold stated cell #3 was not currently being used by the Facility. According to the 5/9/2011 professional engineer inspection, it was determined that the VTA did not substantially meet the requirements of Natural Resource Conservation Standards (NRCS) 635 as the following factors were present:

- A well was located within 100 feet of the VTA.
- The size of the VTA was not large enough to accommodate runoff from the heavy use area when 150 cows are on it for 12 hours/day.
- The north barnyard can be used 7 hours/day with an average of 75 cows on the barnyard at a single time.
- The length of the VTA did not meet the 300 feet required for bunk silo VTAs.
- Screens below the low flow collection area must be installed.
- The entire concrete area must be cleaned so that leachate and runoff will be free flowing on the concrete.

A very detailed operation and maintenance plan for the VTA was provided as it included procedures for collection areas, low flow separation, high flow collection and the VTA itself.

At the time of the inspection, EPA Inspector Arvizu observed the following:

- Overgrown vegetation in the VTA

Photo #14 – Overgrown vegetation in VTA; view looking from collection system at Cell #3 (not in use) toward Cells #1 & 2

Kuss' Farm

No silage is stored at the farmstead.

Waste Storage Facilities and Manure Transfer:
Section VIII.C.xi of the NYSDEC CAFO General Permit states that "[c]ollection, storage, and disposal of liquid and solid waste should be managed in accordance with NRCS standards." NRCS Conservation Practice Standard No. 313 "Waste Storage Facility" specifies general criteria applicable to all waste storage facilities as well as additional criteria for waste storage ponds. Section VIII.C.viii of the NYSDEC CAFO General Permit states that "[s]olids, sludges, manure or other pollutants removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent pollutants from being discharged to waters of the State." In addition, Section X.G of the CAFO General Permit requires the permittee to at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with this permit.

Main Farm
According to Mr. Griswold and the Facility's *Manure/Waste Utilization Plan*, there are two manure storage facilities in use at the farmstead and associated reception pits.

Manure at the Parlor/Holding Area is scraped to Pit #1 (53,900 gallon capacity) and manure at Freestall Barn is scraped to Pit #2 (53,900 gallon capacity). Manure then flows from the pits via gravity to the original concrete manure storage that measures 62.9' wide by 62.9' long by 9.5' deep; holds approximately 253,200 gallons of manure, milk parlor waste and leachate; and has approximately 21 days of storage. Mr. Griswold stated that the manure storage was installed in 1998.

Manure at the Sand Freestall Barn is scraped to a pit and then flows via gravity to the new concrete manure storage that measures 60' wide by 97' long by 8' deep; holds approximately 440,000 gallons of manure; and has approximately 2.5 months of storage. Mr. Griswold stated that the manure storage was constructed in 2008.

At the time of the inspection, EPA Inspector Arvizu observed a depth marker and max fill marker in both concrete manure storages. Mr. Vogel stated that the original concrete storage was approximately ½ full and that the new concrete storage was approximately 1/8th full. Both storages were observed to have fences and gates with appropriate warning signs.

Jack's Farm
There is no manure storage at the farmstead. Mr. Vogel stated that barns are cleaned daily and the manure is land applied. If manure is unable to be land applied, it is taken to the Sand Pit at the Main Farm.

Blooms' Farm
There is no manure storage at the farmstead. Mr. Vogel stated that the Heifer/Dry Cow Freestall Barn is cleaned every day and manure is land applied. If manure is unable to be land applied, it is stored temporarily at the north end of the facility on a concrete pad. Runoff from the manure stacking pad would be collected with leachate and be diverted to the farmstead VTA.

EPA Inspector Arvizu did not observe storage of manure at the farmstead during the inspection.

Kuss' Farm
Semi-solid manure stored on manure stacking area located to the north of the Coverall Barn. Runoff from the manure stacking area is collected in a collection system immediately adjacent to the stacking area. The collection

system includes a filter area that was designed by the Onondaga County Soil and Water Conservation District. Specifics relating to the filter area such as design plans were not available for review during the inspection.

During the inspection, EPA Inspector Arvizu observed that the screens in the collection system were clogged with residue feed and solids. Mr. Vogel stated that the screens are usually cleaned 5 to 6 times a year, but could not definitively recall when the screens were last cleaned as there was no set schedule for cleaning.

Photo #15 – North barnyard/manure stacking area at Kuss' Farm; view looking east

Photo #16 – North barnyard collection system at Kuss' Farm; note buildup of feed and residue in screens

Other wastes:
Section VIII.C.x of the NYSDEC CAFO General Permit requires that dead animals shall be properly disposed of within three (3) days and in a manner to prevent contamination of waters of the State or creation of a public health hazard and "NRCS Conservation Practice Standard No. NY317 (Composting Facility)" states that contaminated runoff from compost facilities should be directed to appropriate storage or treatment facility for further management.
Calf mortalities at the Facility are handled through composting at the Main Farm and mature cows are rendered. The calf mortality compost pile is located at the southern end of Field M-1 (across the road from the farmstead). At the time of the inspection, EPA Inspector Arvizu observed that the Facility utilizes a hay/straw base and covers with the same. Minimal ponding of leachate was observed around the pile.

CONCLUSIONS:

Potential Violations

1. Section IX.F of the CAFO General Permit requires the permittee to retain copies of all records and reports required by this permit for a period of at least 5 years from the date reported. The following records were not retained as required:
    a. Section IX.K of the NYSDEC CAFO General Permit also specifies that all precipitation events in excess of 0.3 inches shall be measured and recorded. At the time of the inspection, EPA Inspector Arvizu observed the following records: April 2011– December 2011; April 2012 – December 2012; April 2013 – December 2013; and May 2014 – present day. Records from June 2009 to March 2011 were not available.

    b. Section IX.N.ii of the NYSDEC CAFO General Permit requires daily water line inspections, including drinking water and cooling water lines to be conducted and Section IX.O.i (*Production Areas*) requires records of those inspections to be documented. At the time of the inspection, EPA Inspector Arvizu observed that daily water line inspections at the Facility were available for November 2011 – April 2012 and January 2013 to August 2013 only. Records from April 2011 (when the Facility received coverage as a large CAFO) to October 2011, May 2012 to December 2012, and September 2013 to June 2014 (present day) were not available.

    c. Section IX.O.ii (*Production Areas*) of the NYSDEC CAFO General Permit requires the permittee to keep weekly records of depth marker readings for manure and process wastewater in any open liquid storage structures. At the time of the inspection, EPA Inspector Arvizu observed that weekly depth marker readings were available for the original concrete storage and the new concrete storage for the following time periods: October 31, 2011 – September 23, 2012 and January 2013 – June 2014 (present day). No records were available for the both storages from April 2011 (when the Facility received coverage as a large CAFO) to October 2011 and October 2013 – December 2013.

    d. Section IX.O.ii (*Land Application Areas*) of the NYSDEC CAFO General Permit requires the permittee to keep records of the date(s) that manure application equipment was inspected. At the time of the inspection, EPA Inspector Arvizu observed that the Facility did not have records of when its manure application equipment was inspected.

2. Section VIII.C.xi of the NYSDEC CAFO General Permit requires that "[c]ollection, storage, and disposal of liquid and solid waste should be managed in accordance with NRCS standards." Specifically, NRCS Conservation Practice Standard No. 312 "Waste Management System" states that "waste" includes polluted runoff such as that from a barnyard or silo, and that all farms with silage will address silage leachate control." In addition, NRCS Conservation Practice Standard No. 635 "Vegetated Treatment Area" (VTA) specifies general criteria applicable to all vegetative treatment areas as well as additional criteria for treatment of bunk silo leachate.

Section X.G of the CAFO General Permit requires the permittee to, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with this permit. At the time of the inspection, the EPA inspection team observed the following:

a. Improper operation and maintenance of the leachate collection system in use at the Main Farm. Specifically, EPA Inspector Arvizu observed excessive solids in the collection system which had been previously noted by NYSDEC during its 8/27/2013 inspection.
b. In addition, EPA Inspector Arvizu observed that the VTA had not been mowed since fall 2013 as it was very overgrown.
c. Significant kill zones in the VTA treating silage leachate and underbunk drainage.
d. Improper operation and maintenance of the collection system in use at Kuss' Farm. Specifically, EPA Inspector Arvizu observed that the collection screens were clogged with residue feed and solids and had not been cleaned out.

Areas of Concern

1. Section IX.K of the NYSDEC CAFO General Permit requires the permittee install and maintain a standard rain gauge in the proximity of the confinement area. During the inspection, EPA Inspector Arvizu observed that the Facility maintained a rain gage at its Main Farm only. The Main Farm and Jack's Farm are in close proximity to each other. However, Blooms' and Kuss' Farms are located 10-12 miles away to the north. Therefore, EPA recommends that the Facility install a second rain gage in the proximity of the confinement area for Blooms' and Kuss' Farms and begin maintaining rainfall records for the new gage.

2. Section VII.B of the NYSDEC CAFO General Permit requires CNMPs to have been "prepared in accordance with NRCS Conservation Practice Standard No. NY312" which requires that clean water be excluded from concentrated waste areas to the fullest extent practical. During the inspection, the EPA inspection team observed that clean water was not excluded from concentrated waste areas to the fullest extent possible in the following area:
    a. Heifer Barn at Main Farm – EPA Inspector Arvizu observed dirty pooling water adjacent to the barn and flowing to a tile line to the north of the bunk silo and eventually out to the VTA on the south side of the bunk silo. The pooling water was black and contaminated with runoff from the bunk silo, Heifer Barn, and Calf Barn.
    b. Calf Barn at Main Farm - Semi-solid manure stored outside of the Calf Barn. While the Facility stated that the manure was cleaned up on a regular basis, there is still the possibility that the manure may come into contact with clean water. Therefore, clean water has not been excluded to the fullest extent possible.
    c. Bunk Silo – EPA Inspector Arvizu observed ponding of stormwater and contaminated runoff adjacent to the silage leachate collection system at the Main Farm. Specifically, ponding was occurring south of the concrete pad near the Facility's settling basin and high flow distribution system.

    On August 6, 2014, Mr. Travers informed EPA that the Facility has taken some steps to begin corrective actions to address the concerns identified above (e.g. plugged the tile line and is in process of adding a collection tank to capture runoff from the bunk) and planned to forward documentation when the work was completed.

3. During the inspection, the EPA inspection team observed that not all stormwater collection and clean water diversions were mapped on the Facility maps. Specifically, EPA Inspector Arvizu observed a catch basin at the south end of the Dry Cow Barn that was not identified on the farmstead map. In addition, a small drain/inlet was observed at Blooms' Farm adjacent to the high moisture corn silo.

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE
INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA0001168	Date: 6/19/2014

I. INSPECTION INFORMATION

Purpose of Inspection (Check any appropriate box): ☐ Reconnaissance (page 1 only) ☒ Comprehensive ☐ Complaint Response	DEC Region	Date	Time
	7	6/19/14	0805

Inspector Name: Christy Arizzi	Inspector Signature: Christy Arizzi
Owner/Operator Representative:	Representative Title:

Street/Rte. No.: W. Bennett Hollow Rd	C/T/V: Preble	County: Cortland* Onondaga	Phone Number: (607) 423-8251

Other Inspection Attendees, Affiliations, Phone Numbers:
See inspection report

1. Present Weather Conditions:	2. Weather Previous 24 Hours:	3. Other Notable Weather Concerns:
PtlySunny; low 60's → mid 70's	some rainfall	

4. Permitted Facility ☒ Yes ☐ No (If no complete and attach determination worksheet)

Items	Comments
5a. Comprehensive Nutrient Management Plan	
5b. Emergency Action Plan	
5c. Monitoring and Reporting	
6. Barnyard Runoff Management	
7. Silage/Feed/Commodities Storage	
8. Waste Storage Facilities and Manure Transfer	
9. Wastewater Treatment Strip	
10. Best Management Practice Implementation	
11. Waste Treatment Systems	

12. COMMENTS/DESCRIPTION

Overall Facility Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE INSPECTOR FOR THE PERMITTEE

Facility Name: Pebble Hill Farm, LLC	SPDES: NYA000148	Date: 6/19/2014

II. GENERAL INFORMATION

1. Surface water(s) which would receive production area discharges: Upper Onondaga Creek (Bloom's, Kuss')

2. Watershed(s): (CBP, NYC, Lk Chmpln, etc.)
Chesapeake (Home + Jacks); Onondaga Lk-Onondaga Crk (Bloom's + Kuss)

3. Is there analytical data from the farm well(s) indicating contamination? ☐ Yes ☐ No
Cornell tests

4. Type(s) and numbers of animals currently managed:
~900 mature

5a. Type of Operation: ☒ Year Round ☐ Seasonal

5b. Type of Operation: ☐ Open Lot ☒ Partially Exposed ☐ Fully Roofed

6. Are human wastes being mixed or stored with manure or process wastewater? ☐ Yes ☒ No

7. Are additional nutrients imported? (Excl: commercial/chemical fertilizer) ☐ Yes ☒ No

If "Yes", what types and amounts?

8. Are nutrients being exported? ☒ Yes ☐ No

9. If the volume of manure, litter, or process wastewater exported exceeds 50 tons annually to any one recipient have the entity, dates, amounts, and address of recipient, been documented in the CNMP? ☒ Yes ☐ No

10. Have all waste recipients been provided with the nutrient content of the manure? ☒ Yes ☐ No

11. Are all waste storage facilities mapped and included in the CNMP? ☒ Yes ☐ No

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE
INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA000168	Date: 6/19/2014

III. COMPREHENSIVE NUTRIENT MANAGEMENT PLAN (CNMP)

1. Has CNMP been completed and is it available onsite? ☒ Yes ☐ No

2. Is the CNMP *certification* / Appendix B (completed and signed) available onsite? ☒ Yes ☐ No

3. Are the annual compliance reports / Appendix D (completed and signed) available onsite? ☒ Yes ☐ No generally
2009-2011, 2013 avail; 2012 not avail.

4. Are field data/nutrient application (e.g. Cropware Output) sheets available? ☒ Yes ☐ No

5. Are soil test results less than 3 years old? ☒ Yes ☐ No

6. Have manure nutrient analyses been completed in the past year? (large) or past 2 years? (medium) ☒ Yes ☐ No
see insp. rpt for details

7. Are fields with very high P Index scores scheduled to receive or receiving additional manure or P-fertilizer?
☐ Yes ☐ No N/A

8. Do fields with very high N Index scores have adjusted practice recommendations (e.g. cover crops, timing of application)?
☒ Yes ☐ No

9. Are field spreading setbacks recorded for wells and streams (perennial and intermittent)? ☒ Yes ☐ No

10. Are manure applications being recorded and tallied by individual field or management unit? ☒ Yes ☐ No

11. Is field spreading in general accord with recommendations? ☒ Yes ☐ No
see insp. rpt for details

12. Does the CNMP identify fields to spread during adverse weather conditions? ☒ Yes ☐ No

13. Identify any new animal housing or manure storage structures added since last inspection:
N/A

14. Are these new structures recorded in the CNMP? ☐ Yes ☐ No } N/A

15. Was the CNMP updated for facility expansion as necessary (e.g. herd or flock increases of ≥ 20%)? ☐ Yes ☐ No

16. Is an emergency action plan available? ☒ Yes ☐ No

17. If "Yes", has it been communicated to employees? (ex: posted in appropriate languages) ☒ Yes ☐ No
posted

18. Has the CNMP been fully implemented? ☒ Yes ☐ No

If "No," provide current status:

Overall Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE
INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farms, LLC	SPDES: NYA000168	Date: 6/19/2014

IV. STORMWATER RUNOFF MANAGEMENT

Complete one Section IV. for Each Farmstead (Use Multiple Sheets If Necessary)

Farmstead Name / Identifier: Main Farm — See insp. rpt for details

1. Is there evidence of runoff discharged directly to a surface water? ☐ Yes ☒ No
   If "Yes," describe pipe(s) or channel(s), show location(s) on the map, and indicate if contaminated or potentially contaminated:

2. Farmstead Runoff Management System Includes:
   ☐ Runoff to Waste Storage ☐ Solids Sedimentation System
   ☒ Wastewater Treatment Strip ☐ Direct Flows to Remote Field ☐ Other drip trenches (Dry Cow)

3. Does clean water come into contact with the production area? ☒ Yes ☐ No

4. Do roof drains segregate clean rainwater from contaminated runoff? ☐ Yes ☐ No N/A

5. Does a watercourse flow through the production area? ☐ Yes ☒ No

6. If "Yes", have livestock been completely fenced out of production area watercourses? ☐ Yes ☐ No N/A

7. Describe any deficiencies (e.g. operation and maintenance) and the various stages of implementation:

Overall Rating:

V. OTHER WASTES

1. Are milking center wastes co-disposed with manure? ☒ Yes ☐ No

2. If "No", describe the method or system for disposal/treatment:

3. Are procedures for handling and disposal of dead animals sufficient? ☒ Yes ☐ No
   Field M-1; calves composted & cows rendered

4. How is the spoiled silage/feed/commodities handled?
   Spread

5. Describe any deficiencies and the various stages of implementation:

Overall Rating:

Facility Name: Preble Hill Farms, LLC	SPDES: NYA0001168	Date: 6/19/2014

IV. STORMWATER RUNOFF MANAGEMENT

Complete one Section IV. for Each Farmstead (Use Multiple Sheets If Necessary)

Farmstead Name / Identifier: Jack's Farm

See insp. rpt for details

1. Is there evidence of runoff discharged directly to a surface water? ☐ Yes ☒ No
   If "Yes," describe pipe(s) or channel(s), show location(s) on the map, and indicate if contaminated or potentially contaminated:

2. Farmstead Runoff Management System Includes: ☐ Runoff to Waste Storage ☐ Solids Sedimentation System ☐ Wastewater Treatment Strip ☒ Direct Flows to Remote Field ☐ Other

3. Does clean water come into contact with the production area? barnyard ☒ Yes ☐ No

4. Do roof drains segregate clean rainwater from contaminated runoff? ☐ Yes ☐ No NA

5. Does a watercourse flow through the production area? ☐ Yes ☒ No

6. If "Yes", have livestock been completely fenced out of production area watercourses? ☐ Yes ☐ No NA

7. Describe any deficiencies (e.g. operation and maintenance) and the various stages of implementation:

Overall Rating:

V. OTHER WASTES

1. Are milking center wastes co-disposed with manure? ☐ Yes ☐ No

2. If "No", describe the method or system for disposal/treatment:

3. Are procedures for handling and disposal of dead animals sufficient? ☐ Yes ☐ No

4. How is the spoiled silage/feed/commodities handled?

5. Describe any deficiencies and the various stages of implementation:

Overall Rating:

Facility Name: Preble Hill Farms, LLC	SPDES: NYA0001168	Date: 6/19/2014

IV. STORMWATER RUNOFF MANAGEMENT

Complete one Section IV. for Each Farmstead (Use Multiple Sheets If Necessary)

see insp. rpt for details

Farmstead Name / Identifier: Bloom's Farm

1. Is there evidence of runoff discharged directly to a surface water? ☐ Yes ☒ No
   If "Yes," describe pipe(s) or channel(s), show location(s) on the map, and indicate if contaminated or potentially contaminated:

2. Farmstead Runoff Management System Includes: ☐ Runoff to Waste Storage ☐ Solids Sedimentation System ☐ Wastewater Treatment Strip ☒ Direct Flows to Remote Field ☐ Other

3. Does clean water come into contact with the production area? ☐ Yes ☒ No

4. Do roof drains segregate clean rainwater from contaminated runoff? ☐ Yes ☐ No N/A

5. Does a watercourse flow through the production area? ☐ Yes ☒ No

6. If "Yes", have livestock been completely fenced out of production area watercourses? ☐ Yes ☐ No N/A

7. Describe any deficiencies (e.g. operation and maintenance) and the various stages of implementation:

Overall Rating:

V. OTHER WASTES

1. Are milking center wastes co-disposed with manure? ☐ Yes ☐ No

2. If "No", describe the method or system for disposal/treatment:

3. Are procedures for handling and disposal of dead animals sufficient? ☐ Yes ☐ No

4. How is the spoiled silage/feed/commodities handled?

5. Describe any deficiencies and the various stages of implementation:

Overall Rating:

Facility Name: Pebble Hill Farm, LLC | SPDES: NYA0001168 | Date: 6/19/2014

IV. STORMWATER RUNOFF MANAGEMENT

Complete one Section IV. for Each Farmstead (Use Multiple Sheets If Necessary)

Farmstead Name / Identifier: Kuss' Farm — See insp. rpt for details

1. Is there evidence of runoff discharged directly to a surface water? ☐ Yes ☒ No
   If "Yes," describe pipe(s) or channel(s), show location(s) on the map, and indicate if contaminated or potentially contaminated:

2. Farmstead Runoff Management System Includes: ☐ Runoff to Waste Storage ☐ Solids Sedimentation System ☐ Wastewater Treatment Strip ☒ Direct Flows to Remote Field ☐ Other

3. Does clean water come into contact with the production area? ☐ Yes ☒ No

4. Do roof drains segregate clean rainwater from contaminated runoff? ☐ Yes ☐ No N/A

5. Does a watercourse flow through the production area? ☐ Yes ☒ No

6. If "Yes", have livestock been completely fenced out of production area watercourses? ☐ Yes ☐ No N/A

7. Describe any deficiencies (e.g. operation and maintenance) and the various stages of implementation:

Overall Rating:

V. OTHER WASTES

1. Are milking center wastes co-disposed with manure? ☐ Yes ☐ No

2. If "No", describe the method or system for disposal/treatment:

3. Are procedures for handling and disposal of dead animals sufficient? ☐ Yes ☐ No

4. How is the spoiled silage/feed/commodities handled?

5. Describe any deficiencies and the various stages of implementation:

Overall Rating:

Facility Name: Preble Hill Farm, LLC	SPDES: NYA000168	Date: 6/19/2014

VI. SILAGE/FEED/COMMODITIES STORAGE

Complete Section VI. for Each Silage/Feed/Commodities Storage Area (Use Multiple Sheets If Necessary) see insp. rpt for details

Storage Area Name / Identifier: Main Farm

1. Describe the material(s), method(s) and approximate storage capacity:

302' x 130'; corn silage + haylage

2. Are adequate measures taken to exclude precipitation/groundwater? ☒ Yes ☐ No

3. If "No", describe:

4. Leachate/Runoff Management includes : ☐ Runoff to Waste Storage ☐ Solids Separation System
☒ High/Low Flow Separator ☒ Wastewater Treatment Strip ☐ Direct Flows to Field ☐ Other

5. Are Ag Bags being placed such that the leachate runoff could affect water quality? ☐ Yes ☐ No N/A

6. If 5 "Yes", is an appropriate leachate control system in place? ☐ Yes ☐ No N/A

Overall Rating:

VII. MONITORING AND REPORTING

1. Is a rain gage maintained onsite? at Main Farm; but not in prox. of Blooms/Kurs ☐ Yes ☐ No
2. If "Yes", have all precipitation events in excess of 0.3 inch been measured and recorded? ☐ Yes ☒ No
3. Does the permittee retain copies of all records and reports for at least 5 years? See insp. rpt ☐ Yes ☒ No

Note deficiencies found: See insp. rpt for details

4. Are records of overflows from production areas, including the date and time and an estimate of the volume available and sufficient? ☐ Yes ☐ No

FOR LARGE BEEF, DAIRY, VEAL CALF, SWINE, AND POULTRY CAFOS: - See insp. report for details

5. Have weekly inspections of all storm water devices, runoff diversion structures, animal waste storage structures, and devices channeling contaminated storm water to the wastewater and manure storage and containment structure been done and adequately recorded? ☐ Yes ☒ No
6. Are weekly records of the depth marker readings for manure and process wastewater in any open liquid storage structures available and sufficient? ☐ Yes ☒ No
7. Are records of precipitation exceeding 0.3 inch for a period of 24 hours prior to, during, and for 24 hours after land applications available? retained since 2010 (before becoming large CAFO) ☒ Yes ☐ No

Overall Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA000168	Date: 6/19/2014

VI. SILAGE/FEED/COMMODITIES STORAGE

Complete Section VI. for Each Silage/Feed/Commodities Storage Area (Use Multiple Sheets If Necessary)

Storage Area Name / Identifier: Blooms Farm — See insp. rpt for details

1. Describe the material(s), method(s) and approximate storage capacity:

100' x 60'; haylage

2. Are adequate measures taken to exclude precipitation/groundwater? ☒ Yes ☐ No

3. If "No", describe:

4. Leachate/Runoff Management includes : ☐ Runoff to Waste Storage ☐ Solids Separation System
☒ High/Low Flow Separator ☒ Wastewater Treatment Strip ☐ Direct Flows to Field ☐ Other

5. Are Ag Bags being placed such that the leachate runoff could affect water quality? ☐ Yes ☐ No N/A

6. If 5 "Yes", is an appropriate leachate control system in place? ☐ Yes ☐ No N/A

Overall Rating:

VII. MONITORING AND REPORTING

1. Is a rain gage maintained onsite? ☐ Yes ☐ No

2. If "Yes", have all precipitation events in excess of 0.3 inch been measured and recorded? ☐ Yes ☐ No

3. Does the permittee retain copies of all records and reports for at least 5 years? ☐ Yes ☐ No

Note deficiencies found:

4. Are records of overflows from production areas, including the date and time and an estimate of the volume available and sufficient? ☐ Yes ☐ No

FOR LARGE BEEF, DAIRY, VEAL CALF, SWINE, AND POULTRY CAFOS:

5. Have weekly inspections of all storm water devices, runoff diversion structures, animal waste storage structures, and devices channeling contaminated storm water to the wastewater and manure storage and containment structure been done and adequately recorded? ☐ Yes ☐ No

6. Are weekly records of the depth marker readings for manure and process wastewater in any open liquid storage structures available and sufficient? ☐ Yes ☐ No

7. Are records of precipitation exceeding 0.3 inch for a period of 24 hours prior to, during, and for 24 hours after land applications available? ☐ Yes ☐ No

Overall Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA0001168	Date: 6/19/2014

VIII. WASTE STORAGE FACILITIES and MANURE TRANSFER

Complete Section VIII. for Each Waste Storage Facility (Use Multiple Sheets If Necessary) see insp. rpt for details

Waste Storage Facility Name / Identifier: Main Farm - Freestall Barn / Holding Area

1. Are "As Builts" documentation of the installation Available and Signed by a PE or appropriate NRCS Employee? 3/21/2008 ☒ Yes ☐ No

2. Is there an Undesigned Storage Evaluation Certification Letter Signed by a PE or appropriate NRCS Employee (If yes attach copy to inspection report)? ☐ Yes ☐ No NA

3. If Both 1 and 2 are "No", is it scheduled for an evaluation by a PE? ☐ Yes ☐ No NA

4. What is the date of installation of the waste storage facility? 1998

5. What materials are stored? (e.g. manure, whey, leachate) Manure, leachate, parlor waste

6. Construction: ☐ Clay-Lined ☐ Plastic-Lined ☐ Unlined ☐ Steel ☒ Concrete ☐ Other

7. Capacity (gallons): 253,000 gal

6. Approximate Dimensions (ex: side slopes, LxWxD) 62.9' x 62.9' x 9.5'

8. Approximate Storage Period: ~21 days

9. Has a permanent depth marker or recorder been installed at the design storage level?(NY313) ☒ Yes ☐ No

10. Is there evidence of the waste storage facility exceeding the design storage volume? ☐ Yes ☒ No

11. Is fencing in place surrounding the storage?(NY313) ☒ Yes ☐ No

12. Are outside embankments covered with properly maintained vegetation to control erosion?(NY313) ☐ Yes ☐ No NA

13. Are trees, rodent holes, cracks, seeps, etc. evident in the embankment area surrounding the wsf? ☐ Yes ☒ No

14. Does the storage have a written O&M plan and does it appear that it is being followed? ☐ Yes ☐ No DNI

15. Describe any deficiencies and the various stages of implementation:
(ex: lack of records, poor maintenance, etc.)

Overall Rating:

If there are Associated Permanent or Semi-Permanent Pipelines:

18. Are they: ☐ Above Ground ☒ Below Ground

19. Are there stand pipes/valves/junctions at or near streams? ☐ Yes ☐ No

20. Do the valves appear to function properly? ☐ Yes ☐ No

21. Is there evidence of leakage in the pipeline(s), pumps, or valves?(NY634) ☐ Yes ☐ No

22. Are there anti-siphon devices in place? ☐ Yes ☐ No

} DNI

Overall Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA000168	Date: 6/19/2014

VIII. WASTE STORAGE FACILITIES and MANURE TRANSFER

Complete Section VIII. for Each Waste Storage Facility (Use Multiple Sheets If Necessary)

See insp. rpt for details

Waste Storage Facility Name / Identifier: Main Farm Sand Freestall

1. Are "As Builts" documentation of the installation Available and Signed by a PE or appropriate NRCS Employee? 1/25/2010 ☒ Yes ☐ No

2. Is there an Undesigned Storage Evaluation Certification Letter Signed by a PE or appropriate NRCS Employee (If yes attach copy to inspection report)? ☐ Yes ☐ No N/A

3. If Both 1 and 2 are "No", is it scheduled for an evaluation by a PE? ☐ Yes ☐ No N/A

4. What is the date of installation of the waste storage facility? 2008

5. What materials are stored? (e.g. manure, whey, leachate) Manure

6. Construction: ☐ Clay-Lined ☐ Plastic-Lined ☐ Unlined ☐ Steel ☒ Concrete ☐ Other

7. Capacity (gallons): 440,000 gal

8. Approximate Storage Period: ~2.5 MO

6. Approximate Dimensions (ex: side slopes, LxWxD) 40' x 97' x 8'

9. Has a permanent depth marker or recorder been installed at the design storage level?(NY313) ☒ Yes ☐ No

10. Is there evidence of the waste storage facility exceeding the design storage volume? ☐ Yes ☒ No

11. Is fencing in place surrounding the storage?(NY313) ☒ Yes ☐ No

12. Are outside embankments covered with properly maintained vegetation to control erosion?(NY313) ☐ Yes ☐ No N/A

13. Are trees, rodent holes, cracks, seeps, etc. evident in the embankment area surrounding the wsf? ☐ Yes ☒ No

14. Does the storage have a written O&M plan and does it appear that it is being followed? ☐ Yes ☐ No DNI

15. Describe any deficiencies and the various stages of implementation:
(ex: lack of records, poor maintenance, etc.)

Overall Rating:

If there are Associated Permanent or Semi-Permanent Pipelines: N/A

18. Are they: ☐ Above Ground ☐ Below Ground

19. Are there stand pipes/valves/junctions at or near streams? ☐ Yes ☐ No

20. Do the valves appear to function properly? ☐ Yes ☐ No

21. Is there evidence of leakage in the pipeline(s), pumps, or valves?(NY634) ☐ Yes ☐ No

22. Are there anti-siphon devices in place? ☐ Yes ☐ No

Overall Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE
INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA000168	Date: 6/19/2014

VIII. WASTE STORAGE FACILITIES and MANURE TRANSFER

Complete Section VIII. for Each Waste Storage Facility (Use Multiple Sheets If Necessary)

Waste Storage Facility Name / Identifier: Main Farm - Reception Pit #2 (Freestall Barn)

1. Are "As Builts" documentation of the installation Available and Signed by a PE or appropriate [illegible]loyee? 3/21/2008 ☒ Yes ☐ No

2. Is there an Undesigned [illegible]e Evaluation Certification Letter Signed by a PE or appropriate NRCS Employee (If yes attach copy to inspection report)? ☐ Yes ☐ No N/A

3. [illegible] re "No", is it scheduled for an evaluation by a PE? ☐ Yes ☐ No N/A

[illegible] is the date of installation of the waste storage facility? 1998

5. What materials are stored? (e.g. manure, whey, leachate)

6. Co[illegible] ☐ Clay-Lined ☐ Plastic-Lined ☐ Unlined ☐ Steel ☒ Concrete ☐ Other

7. Capacity (gal[illegible] 300 gal

6. Approximate Dimensions (ex: side slopes, LxWxD) 8' x 120' x 8'

8. Approximate Storage flows via gravity to MSF (24" pipe)

9. Has a permanent depth marker or recorder been installed at the design storage level?(NY313) ☐ Yes ☐ No

10. Is there evidence of the waste storage facility exceeding the design storage volume? ☐ Yes ☐ No

11. Is fencing in place surrounding the storage?(NY313) ☐ Yes ☐ No

12. Are outside embankments covered with properly maintained vegetation to control erosion?(NY313) ☐ Yes ☐ No

13. Are trees, rodent holes, cracks, seeps, etc. evident in the embankment area surrounding the wsf? ☐ Yes ☐ No

14. Does the storage have a written O&M plan and does it appear that it is being followed? ☐ Yes ☐ No

15. Describe any deficiencies and the various stages of implementation:
(ex: lack of records, poor maintenance, etc.)

Overall Rating:

If there are Associated Permanent or Semi-Permanent Pipelines:

18. Are they: ☐ Above Ground ☐ Below Ground

19. Are there stand pipes/valves/junctions at or near streams? ☐ Yes ☐ No

20. Do the valves appear to function properly? ☐ Yes ☐ No

21. Is there evidence of leakage in the pipeline(s), pumps, or valves?(NY634) ☐ Yes ☐ No

22. Are there anti-siphon devices in place? ☐ Yes ☐ No

Overall Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA 0001168	Date: 6/19/2014

VIII. WASTE STORAGE FACILITIES and MANURE TRANSFER

Complete Section VIII. for Each Waste Storage Facility (Use Multiple Sheets If Necessary)

Waste Storage Facility Name / Identifier: Main Farm Reception Pit #1 (Milking Parlor)

1. Are "As Builts" documentation of the installation Available and Signed by a PE or appropriate NRCS Employee? 3/21/2008 ☒ Yes ☐ No

2. Is there an Undesigned Storage Evaluation Certification Letter Signed by a PE or appropriate NRCS Employee (If yes attach copy to inspection report)? ☐ Yes ☐ No NA

3. If Both 1 and 2 are "No", is it scheduled for an evaluation by a PE? ☐ Yes ☐ No NA

4. What is the date of installation of the waste storage facility?

5. What materials are stored? (e.g. manure, whey, leachate)

6. Construction: ☐ Clay-Lined ☐ Plastic-Lined ☐ Unlined ☐ Steel ☒ Concrete ☐ Other

7. Capacity (gallons): 53,900 gal

6. Approximate Dimensions (ex: side slopes, LxWxD) 8' x 120' x 8'

8. Approximate Storage Period: flows to MF via gravity (24" pipe)

9. Has a permanent depth marker or recorder been installed at the design storage level?(NY313) ☐ Yes ☐ No

10. Is there evidence of the waste storage facility exceeding the design storage volume? ☐ Yes ☐ No

11. Is fencing in place surrounding the storage?(NY313) ☐ Yes ☐ No

12. Are outside embankments covered with properly maintained vegetation to control erosion?(NY313) ☐ Yes ☐ No

13. Are trees, rodent holes, cracks, seeps, etc. evident in the embankment area surrounding the wsf? ☐ Yes ☐ No

14. Does the storage have a written O&M plan and does it appear that it is being followed? ☐ Yes ☐ No

15. Describe any deficiencies and the various stages of implementation:
(ex: lack of records, poor maintenance, etc.)

Overall Rating:

If there are Associated Permanent or Semi-Permanent Pipelines:

18. Are they: ☐ Above Ground ☐ Below Ground

19. Are there stand pipes/valves/junctions at or near streams? ☐ Yes ☐ No

20. Do the valves appear to function properly? ☐ Yes ☐ No

21. Is there evidence of leakage in the pipeline(s), pumps, or valves?(NY634) ☐ Yes ☐ No

22. Are there anti-siphon devices in place? ☐ Yes ☐ No

Overall Rating:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

Denise Sheehan
Commissioner

DISTRIBUTION
COPIES MUST BE MADE BY THE
INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA0001168	Date: 10/19/2014

VIII. WASTE STORAGE FACILITIES and MANURE TRANSFER

Complete Section VIII. for Each Waste Storage Facility (Use Multiple Sheets If Necessary)

Waste Storage Facility Name / Identifier: Main Farm - Sand Freestall Barn Receptien Pit

1. Are "As Builts" documentation of the installation Available and Signed by a PE or appropriate NRCS Employee? 1/25/2010 ☒ Yes ☐ No

2. Is there an Undesigned Storage Evaluation Certification Letter Signed by a PE or appropriate NRCS Employee (If yes attach copy to inspection report)? ☐ Yes ☐ No N/A

3. If Both 1 and 2 are "No", is it scheduled for an evaluation by a PE? ☐ Yes ☐ No N/A

4. What is the date of installation of the waste storage facility? 2008

5. What materials are stored? (e.g. manure, whey, leachate)

6. Construction: ☐ Clay-Lined ☐ Plastic-Lined ☐ Unlined ☐ Steel ☒ Concrete ☐ Other

7. Capacity (gallons): directed to MSF

6. Approximate Dimensions (ex: side slopes, LxWxD)

8. Approximate Storage Period: 8' x 130' x 8'

9. Has a permanent depth marker or recorder been installed at the design storage level?(NY313) ☐ Yes ☐ No

10. Is there evidence of the waste storage facility exceeding the design storage volume? ☐ Yes ☐ No

11. Is fencing in place surrounding the storage?(NY313) ☐ Yes ☐ No

12. Are outside embankments covered with properly maintained vegetation to control erosion?(NY313) ☐ Yes ☐ No

13. Are trees, rodent holes, cracks, seeps, etc. evident in the embankment area surrounding the wsf? ☐ Yes ☐ No

14. Does the storage have a written O&M plan and does it appear that it is being followed? ☐ Yes ☐ No

15. Describe any deficiencies and the various stages of implementation:
(ex: lack of records, poor maintenance, etc.)

Overall Rating:

If there are Associated Permanent or Semi-Permanent Pipelines:

18. Are they: ☐ Above Ground ☐ Below Ground

19. Are there stand pipes/valves/junctions at or near streams? ☐ Yes ☐ No

20. Do the valves appear to function properly? ☐ Yes ☐ No

21. Is there evidence of leakage in the pipeline(s), pumps, or valves?(NY634) ☐ Yes ☐ No

22. Are there anti-siphon devices in place? ☐ Yes ☐ No

Overall Rating:

Facility Name: Preble Hill Farm, LLC	SPDES: NYA0001168	Date: 6/19/2014

If there are Associated Tanks/Reception Pits/Hoppers:

22. Have tanks/reception pits/hoppers been sized to contain less than 7 full days' manure production? ☐ Yes ☐ No

23. Is there evidence of leakage in any tanks/reception pits/hoppers?(NY634) ☐ Yes ☐ No

Overall Rating:

IX. WASTEWATER TREATMENT STRIPS

Complete Section IX. for Each Wastewater Treatment Strip (Use Multiple Sheets If Necessary) insp by Dana Chapman on 5/9/2011

Wastewater Treatment Strip Name / Identifier: Main Farm

Wastewater Source: (ex: bunk silo #4)

1. Was the treatment strip designed by a Technical Service Provider or NRCS employee with appropriate job approval authority? ☒ Yes ☐ No

2. Does the treatment strip finished grade appear not less than 2% and not more than 12%?(NY635) ☒ Yes ☐ No

3. Does the treatment strip lower edge appear to be a minimum of 25 feet from surface waters of the State and the entire strip 100 feet from a well?(NY635) ☒ Yes ☐ No

4. Is there evidence of pollution beyond the filter area? ☐ Yes ☒ No

5. Are excess solids problematic in the filter area? ☒ Yes ☐ No
in collection system, also noted in NYSDEC 8/2013 insp.

6. Do all discharges to the treatment strip appear to be uniformly distributed over a level cross-section?(NY635) ☐ Yes ☒ No

7. Is permanent grass-based vegetation present on a uniformly graded strip?(NY635) ☒ Yes ☐ No

8. Are all concentrated wastewaters (low flows) being diverted away from the treatment strip?(NY635) ☒ Yes ☐ No
(i.e. treatment strips should be designed and utilized for the treatment of contaminated runoff from feedlots, barnyards, livestock holding areas, milking center effluents and high flow dilute silage leachate only)

9. Is a kill zone evident in the treatment strip?(NY635) ☒ Yes ☐ No

10. Should further source control be utilized to reduce the volume, frequency, and concentrations of pollutants entering the treatment strip? (Including diversion of clean water up to the peak discharge from a 25yr/24hr storm) ☒ Yes ☐ No

11. Is the treatment strip mowed and harvested periodically?(NY635) ☐ Yes ☒ No

12. Does the treatment strip have a written O&M plan and does it appear that it is being followed? ☐ Yes ☒ No
detailed O+M plan available

Overall Rating:
→ See insp. report for details

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

Denise Sheehan
Commissioner

DISTRIBUTION
COPIES MUST BE MADE BY THE INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC | SPDES: NYA0001168 | Date: 6/19/2014

If there are Associated Tanks/Reception Pits/Hoppers:

22. Have tanks/reception pits/hoppers been sized to contain less than 7 full days' manure production? ☐ Yes ☐ No

23. Is there evidence of leakage in any tanks/reception pits/hoppers?(NY634) ☐ Yes ☐ No

Overall Rating:

IX. WASTEWATER TREATMENT STRIPS

Complete Section IX. for Each Wastewater Treatment Strip (Use Multiple Sheets If Necessary)

Wastewater Treatment Strip Name / Identifier: Blooms Farm

Wastewater Source: (ex: bunk silo #4)

1. Was the treatment strip designed by a Technical Service Provider or NRCS employee with appropriate job approval authority? ☒ Yes ☐ No
   SWCD ; insp. by Dana Chapman 5/9/2011

2. Does the treatment strip finished grade appear not less than 2% and not more than 12%?(NY635) ☒ Yes ☐ No

3. Does the treatment strip lower edge appear to be a minimum of 25 feet from surface waters of the State and the entire strip 100 feet from a well?(NY635) well noted w/in 100' by P.E ☐ Yes ☒ No

4. Is there evidence of pollution beyond the filter area? ☐ Yes ☒ No

5. Are excess solids problematic in the filter area? ☐ Yes ☒ No

6. Do all discharges to the treatment strip appear to be uniformly distributed over a level cross-section?(NY635) ☒ Yes ☐ No

7. Is permanent grass-based vegetation present on a uniformly graded strip?(NY635) ☒ Yes ☐ No

8. Are all concentrated wastewaters (low flows) being diverted away from the treatment strip?(NY635) ☒ Yes ☐ No
   (i.e. treatment strips should be designed and utilized for the treatment of contaminated runoff from feedlots, barnyards, livestock holding areas, milking center effluents and high flow dilute silage leachate only)

9. Is a kill zone evident in the treatment strip?(NY635) ☐ Yes ☒ No

10. Should further source control be utilized to reduce the volume, frequency, and concentrations of pollutants entering the treatment strip? (Including diversion of clean water up to the peak discharge from a 25yr/24hr storm) ☐ Yes ☒ No

11. Is the treatment strip mowed and harvested periodically?(NY635) last mowed fall 2013 ☐ Yes ☒ No

12. Does the treatment strip have a written O&M plan and does it appear that it is being followed? detailed O&M plan ☐ Yes ☒ No

Overall Rating:

Denise Sheehan
Commissioner

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER

CAFO FACILITY INSPECTION REPORT

Version 1.0 - 3/15/06

DISTRIBUTION
COPIES MUST BE MADE BY THE
INSPECTOR FOR THE PERMITTEE

Facility Name: Preble Hill Farm, LLC	SPDES: NYA000168	Date: 6/19/2014

X. PERMITTEE ACTION(S) REQUIRED / COMMENTS

☐ None noted

☐ Actions required as follows:

Refr to EPA inspection report

ADDITIONAL COMMENTS

Items the facility has accomplished:

Significant observed environmental concerns/risks:

THIS REPORT IS ONLY RELEVANT TO THE ITEMS INSPECTED AND CHECKED